

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4 ATLANTA FEDERAL CENTER 61 FORSYTH STREET ATLANTA, GEORGIA 30303-8960

## <u>CERTIFIED MAIL</u> 7018 2290 0000 9993 5224 <u>RETURNED RECEIPT REQUESTED</u>

Mr. Wayne Amaker Plant Manager Concrete Supply Company – Spartanburg Facility 475 Simuel Road Spartanburg, South Carolina 29303

Re: Compliance Stormwater Evaluation Inspection Concrete Supply Company – Spartanburg, South Carolina Permit SCR005527

Dear Mr. Amaker:

On December 13, 2018, the U.S. Environmental Protection Agency Region 4 conducted a Compliance Stormwater Evaluation Inspection (CSWEI) at the Concrete Supply Company – Spartanburg Facility located at 475 Simuel Road, Spartanburg, South Carolina. The purpose of the CSWEI was to evaluate the facility's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and, the State of South Carolina's industrial stormwater regulations.

The EPA appreciates your cooperation in conducting this CSWEI. Enclosed is the EPA's CSWEI report, evaluating Concrete Supply Company's compliance with the CWA. As a result of the inspection, the EPA may be in further contact with Concrete Supply Company in the future.

While a response from you is not required at this time, if you do wish to respond to the CSWEI report, provide additional information, or otherwise discuss the report, please contact LCDR Tara L. Houda at the above address or by email at Houda. Tara@epa.gov.

Sincerely,

Daniel J. O'Lone, Chief

Stormwater and Residuals Enforcement Section NPDES Permitting and Enforcement Branch

Enclosures

cc: Mr. Brian Wisnewski

South Carolina Department of Health and Environmental Control

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# U.S. Environmental Protection Agency, Region 4 61 Forsyth Street SW, Atlanta, GA 30303

# Water Compliance Inspection Report

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|------|----|----|---|---|--------------|---|---|--|
| J VA | V. | 10 |   |   | IJ           | А | Α |  |

NPDES ID: SCR005527 Effective Date: June 26, 2017 Expiration Date: September 30, 2021

Facility Name: Concrete Supply Co - Spartanburg SW-CSCSimuel-12/13/18

Address: 475 Simuel Rd, Spartanburg, SC 29303

On-Site Representative(s), Title, Phone Number:

Responsible Official, Title, Phone Number, Mailing Address: Wayne Amaker

Wayne Amaker, Plant Manager 704-617-4329

467 Simuel Rd.

Spartanburg, SC 29303

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 12/13/18 1:35 pm Exit Date/Time: 12/13/18 5:23 pm

# NAMES OF EPA AND STATE INSPECTORS

EPA, Region IV: Tara Houda, Mark Robertson

|   | AREAS EVAL                 | UATED DURING INSPECTION   | (Check | those areas evaluated)  |  |
|---|----------------------------|---------------------------|--------|-------------------------|--|
|   | Permit                     | Self-Compliance Program   |        | Pretreatment            |  |
|   | Records/ Records           | Compliance Schedule       |        | Pollution Prevention    |  |
| X | Facility Site Review       | Laboratory                | X      | Storm Water             |  |
|   | Effluent/ Receiving Waters | Operations & Maintenance  |        | Combined Sewer Overflow |  |
|   | Flow Measurement           | Sludge Handling/ Disposal |        | Sanitary Sewer Overflow |  |

#### INSPECTION NOTES

See the Archer Western photo log.

| EPA REPRESENTATIVES                    |  |            |  |  |
|--|--|------------|--|--|
| Inspector Signature/Name               | Office/Phone Number                          | Date       |  |  |
| Fara Houda, Environmental Scientist    | USEPA Region 4/WPD-NPEB-SRES<br>404-562-9762 | 12/31/2018 |  |  |
| Mark Robertson, Environmental Engineer | USEPA Region 4/WPD-NPEB-SRES<br>404-562-9639 | 2/4/19     |  |  |
| Management Signature/Name              | Office/Phone Number                          | Date       |  |  |
| Dan O'Lone, Section Chief              | USEPA Region 4/WPD-NPEB-SRES<br>404-562-9434 | 2/4/19     |  |  |

|   |                                      | 1. FACILITY I                       | NFORMATION                                    |   |   |   |
|---|--------------------------------------|-------------------------------------|---|---|---|---|
| GPS Coordinates<br>N34°58'40.00"<br>W81°58'43.08"   | Previous & cur<br>SCR005527 an       |                                     | mit, SIU, & Other M                           | ledia Perm  | it  |   |
| Receiving Water(s), Wetlands, or MS4 tributary to Fairforest Creek, tributary to Chinquapin Creek, Spartanburg County's MS4, Three Mile Creek | Site Acreage & Area<br>92 acres, 53% | % Impervious                        | Type of<br>Ownership                          |   | Qualify for No E<br>Exemption or No<br>No   |   |
| SIC Code(s) Description<br>(Primary & Secondary)<br>3273, 3272, 7538, 3271,<br>5039   |                                      | No. of<br>Employee<br>Not evaluated | Hours & Days of<br>Operation<br>Not evaluated | Listed or<br>tributary<br>Creek wi<br>fecal coli<br>Four Imp<br>Quality M<br>Stations a<br>Fairfores<br>pollutant | te to 303(d) TMDL Waters to Fairforest th a TMDL for form, tributary to aired Water Monitoring are listed for t Creek with s of fecal coliform impairments for d pH | Weather<br>Condition<br>Snow melt.<br>Cold. |

## 2. FACILITY'S OPERATION & PRODUCT DESCRIPTION

#### Concrete batch plant

During the Archer Western inspection, it was unclear if the facility was unpermitted since the Stormwater Pollution Prevention Plan (SWPPP), permit number, and Notice of Intent (NOI) could not be produced. The only record that Archer Western was able to produce was a three-page Process Water Management Plan between Archer Western and CSC. This plan stated that "all process water generated from the batch plant operations will be" "retained on-site" via several best management practices (BMPs) that include a pit, berm, daily visual inspection of pit and berm by Archer Western staff, secondary containment of all bulk liquid containers, truck washout area, periodic visual inspection of truck washout area by Archer Western staff, and water truck for dust control.

Part 5.3 of the Permit states that "You must retain a copy of the current SWPPP required by this permit at the facility, and it must be immediately available" "at the time of an onsite inspection or upon request." Part 5.4 goes on to say that "You are required to maintain the following inspection, monitoring, and certification records and make them readily available to the Department."

Archer Western's Jeff Buck only conducts quarterly walk arounds with CSC and occasionally Metromont. No form is used by Archer Western to document this activity.

On December 18, 2018 at 9:34 am via email, Archer Western's Project Manager Greg Munna provided quarterly reports (10/11/18, 9/14/18, 6/28/18, 3/29/18), NOI (9/19/13 with 12/4/13 certification signature), 6/26/17 DHEC Reauthorization to Discharge issued to Concrete Supply Co LLC SCR005527, and Figure 2 site map dated 9/1/10. Archer Western did not produce a copy of the NOI for the current permit term.

After the inspection of Archer Western, the EPA reviewed some records at CSC Spartanburg and conducted a reconnaissance level inspection. These records included CSC's SWPPP binder (see photos DSCN1674-1682). Additionally, outfalls illustrated on their maps were visited (see photos DSCN1683-1686) and the EPA met with CSC's Plan Manager Wayne Amaker and the Backup Plant Manager Wayne Poston.

| 3. BASIC STORMWATER POLLUTION PREVENT PLAN (SWPPP) INFORM   | ATION | I  |       |
|---|-------|----|-------|
| SWPPP TOPICS  | YES   | NO | N/E   |
| SWPPP on-site The SWPPP was dated February 22, 2011 and signed on July 20, 2012. Dates of review included: 10/13 merged with CSC and no changes for" 10/14, 8/15, 5/17, and 5/18.   |       |    |       |
| The SWPPP contained a March 12, 2018 Feasibility Study that appeared identical to the March 12, 2018 Feasibility Study at the CSC – Mauldin Plant. It stated that CSC "does not find it economically or technically feasible to alter the operations and storage practice of this site. CSC believes that the Stormwater control measures in place are suitable for this operation and any change in their design would not improve their performance. Due to the size and nature of our raw material inventories, our storage practices are limited to the size and cost of available substitutes; however, within our daily operations we employ BMPs to continually address and correct to the best of our abilities any and all materials that may come in contact with Stormwater runoff." This "Feasibility Study" contained no alternatives that were analyzed nor any cost assessments.   | X     |    |       |
| Part 2 of the permit states "In the technology-based limits in Part 2.1 and in Part 8, the term "minimize" means reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice."  |       |    |       |
| SWPPP Certification   | Х     |    |       |
| SWPPP Modified or Update to Current Conditions  |       | Х  |       |
| Pollution Prevention Team Named in SWPPP  | Х     |    |       |
| Includes name, title, and responsibility  Employee Training for Standard Project  A Project Proje | Λ     |    | ·2 76 |
| Employee Training for Stormwater Requirements  Annual at minimum and have a recurring schedule  |       |    |       |
| <ul> <li>All responsible for inspections/monitoring, maintenance, or upkeep of controls, and handle/manage chemicals</li> </ul>   |       |    | X     |
| Site Description  |       |    | X     |
| <ul> <li>Should include property size; flow directions, locations of controls, water conveyances, and stormwater inlets and outfalls; locations of waters, and location of pollutant sources (fueling, maintenance and cleaning areas, loading/unloading, treatment/disposal areas, processing areas, liquid tanks, access roads, bulk transfer areas, and machinery)</li> <li>The Site Map (see photo DSCN1674) did not include the portion of the site leased to Archer Western, the common washout area, or broken concrete piles. Part 3.2.a. of the Permit states that changes in operation of the facility requires review of the control measures to determine if modifications are necessary. Also, not included was: the size of the property in acres, items ii-xiv for the Archer Western portion of the site, direction of flow arrows for the portion of the site along Simuel Road, locations of receiving waters, locations of pipe conveyances, locations of all monitoring point and outfalls (Permit Part 5.1.2.c.).</li> </ul>   | X     |    |       |
| <ul> <li>Summary of Pollutant Sources</li> <li>For the areas with pollutant exposures (i.e. material storage, equipment fueling and maintenance, clean, and outdoor processing), provide a list of the activities, describe the pollutants, identify areas of potential spills and leaks, and summarize monitoring from prior permit term</li> </ul>  |       |    | х     |
| Document Evaluates for Unauthorized Non-stormwater Discharges   |       |    |       |
| <ul> <li>Examples: smoke, dye, or equivalent testing</li> <li>Annual minimum</li> </ul>   |       |    | X     |
| Used to minimize exposure and assure compliance with non-numeric and numeric effluent limits  |       |    | X     |
| Schedule and Procedures for Good Housekeeping  Regular schedule and procedures for the pickup, disposal, inspection, and management of waste material   |       |    | X     |
| Schedule and Procedures for Preventive Maintenance  Regular inspection, testing, maintenance, and repair of equipment   |       |    | X     |

| Contains Spill Prevention & Response Procedures  |   | X |
|--|---|---|
| Contains Erosion and Sediment Controls and Management of Runoff  • Stabilization and management of runoff  | 9 | x |
| Establish sampling locations, sample parameter, schedule/frequency, any control values used, and the procedures and analytical methods used.      Includes quarterly benchmarks, quarterly visual assessments, and effluent limits |   | х |
| Schedule and Procedures for Inspections  |   | x |

| 4. RECORD REVIEW   |     |    |     |
|--|-----|----|-----|
| Record Review  | YES | NO | N/E |
| NOI Submitted to SCDHEC  • Include the acknowledgement letter from state with assigned certification number  CSC did not have the current NOI onsite. CSC provided two copies of a 2013 NOI via email. A September 19, 2013 NOI for operator Concrete Supply Co., LLC for the Spartanburg facility with 10 acres exposed to stormwater with no MS4 listed and discharge to "Unnamed Trib" and no impairments. Impairments included Water Quality Monitoring Station B-021 Fair Forest Creek for fecal. The SIC Code was 3273. There was no signature on the version of this provided by CSC on December 14, 2018 at 10:22 am, but there was a signature on the version provided by CSC on December 18, 2018 at 8:33 am. CSC did not produce a copy of the NOI for the current permit term. |     | X  |     |
| Records of Incidents with Spills, Leaks, and/or Other Releases of Pollutants   |     |    | X   |
| Records of Maintenance and Repairs of Control Measures   |     |    | X   |
| <ul> <li>Records of Routine Inspections</li> <li>Include all areas industrial materials and activities exposed to SW and the control measures used to address them.</li> <li>Performed at a minimum quarterly (with it occurring during a rain event once per year)</li> <li>Include at a minimum: time/date, inspector name and signature, weather conditions, unidentified discharges, control measures needing repair, replacement, or additions, and observed noncompliance</li> </ul>   |     |    |     |
| <ul> <li>Records of Periodic Monitoring (benchmark and visual assessments)</li> <li>Collected to representative of outfall, within 30 min of actual discharge, and &gt;72-hrs of last rain event</li> <li>Have records of collection time and data, location, sampler, observations, and potential contaminate source</li> <li>Storm event data (start, stop, rainfall total)</li> </ul>   | Х   |    |     |
| Quarterly visuals with observed issues included: 9/14/18, 6/28/18, 3/29/18, 12/20/18, 9/28/17, 3/20/17, and 10/11/18.  |     |    |     |
| The December 17, 2015 002 sample may have exceeded the TSS (60.4 mg/L) and pH (9.7) effluent limits. The October 11, 2018 Outfall #2 sample exceeded the TSS (78.0 mg/L) effluent limit. No corrective action was observed in the SWPPP binder. Part 3.1.b. states that revision of control measures is required when a numeric effluent limit is exceeded. Part 5.2 of the Permit states that the SWPPP must be modified whenever necessary to address any of the triggering conditions for corrective action in Part 3.1 and to ensure they do not reoccur.  |     |    |     |
| Part 8.E.4 of the permit contains the Sector E Specific Benchmarks:  |     |    |     |

| ecord Review  | 4. RECORD REV  |  | YES          | NO  | N/E |
|---|--|--|--------------|-----|-----|
|   |  | BESTEROPE SHERE TO SHEET.  |              | 110 | IVE |
| Ta  | able 8.E-1.  |  |              |     |     |
| Subsector<br>(You may be subject to requirements for<br>more than one sector/subsector)   | Parameter  | Benchmark<br>Monitoring Cutoff<br>Concentration  |              |     |     |
| Subsector E1. Clay Product Manufacturers<br>(SIC 3251-3259, 3261-3269)  | Total Suspended Solids<br>(TSS)  | 100 mg/L   |              |     |     |
| Subsector E2. Concrete and Gypsum Product<br>Manufacturers (SIC 3271-3275)  | Total Suspended Solids<br>(TSS)  | 100 mg/L   |              |     |     |
| pH 6.0 - 9.0 s.u.   |  |  |              |     |     |
| Industrial Activity   | ble 8.E-2 <sup>1</sup> Parameter   | Effluent Limitation  |              |     |     |
|   | ble 8.E-2 <sup>1</sup> Parameter   | Effluent Limitation  |              |     |     |
| Discharges from material storage piles at cement manufacturing facilities   | Total Suspended Solids<br>(TSS)<br>pH  | 50 mg/L. daily<br>maximum <sup>2</sup><br>6.0 - 9.0 s.u. <sup>2</sup>  |              |     |     |
|   |  |  |              |     | 1   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-years limitations (40 CFR 411.32(b)).  | ear. 24-hour rainfall event shall n  | volume of runoff from<br>ot be subject to the pH and   |              |     |     |
| 'Monitor annually.  Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-years limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  Assess everything subject to permit (from Investigate and eliminate non-stormwate)  | ear, 24-hour rainfall event shall n  | ot be subject to the pH and  |              |     | X   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-years limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  Assess everything subject to permit (from Investigate and eliminate non-stormwate ecords of Employee Training   | ear. 24-hour rainfall event shall not not shall not not shall not sources, not support not sources, redischarges   | ot be subject to the pH and  |              | X   | X   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-years limitations (40 CFR 411.32(b)).  coords of Comprehensive Annual Inspections  Assess everything subject to permit (from Investigate and eliminate non-stormwate coords of Employee Training training record was present for the last 12 more  | ear. 24-hour rainfall event shall not not shall not not shall not sources, not support not sources, redischarges   | ot be subject to the pH and  |              |     | X   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-year TSS limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  • Assess everything subject to permit (from entreatment) in the Investigate and eliminate non-stormwate ecords of Employee Training training record was present for the last 12 more ecords of Benchmark Sampling  • Base compliance on 4 quarter average to above Records of Periodic Monitoring.   | ear. 24-hour rainfall event shall not shall no | ot be subject to the pH and  |              | X   | X   |
| Any untreated overflow from facilities designed, consumaterials storage piles which is associated with a 10-years limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  • Assess everything subject to permit (from 10 investigate and eliminate non-stormwater ecords of Employee Training 10 training record was present for the last 12 more ecords of Benchmark Sampling  • Base compliance on 4 quarter average 12 above Records of Periodic Monitoring.  Ecords of Effluent Monitoring  • Include impaired pollutants if discharging that pollutant not being in the water).  • Follow up sampling within 30 days of a ractions resulting from the exceedance)   | ear. 24-hour rainfall event shall not shall no | to control measures)  out after a year of demonstrat   | . 22         |     | X   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-year TSS limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  • Assess everything subject to permit (from end of Employee Training training record was present for the last 12 more ecords of Benchmark Sampling  • Base compliance on 4 quarter average the above Records of Periodic Monitoring.  ecords of Effluent Monitoring  • Include impaired pollutants if discharging that pollutant not being in the water).  • Follow up sampling within 30 days of a ractions resulting from the exceedance) the above Records of Periodic Monitoring.  | ear. 24-hour rainfall event shall not shall no | ot be subject to the pH and to control measures)  out after a year of demonstration of the correct   | tive         | X   | X   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-year TSS limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  • Assess everything subject to permit (from 10 investigate and eliminate non-stormwate ecords of Employee Training in training record was present for the last 12 more ecords of Benchmark Sampling  • Base compliance on 4 quarter average the above Records of Periodic Monitoring.  ecords of Effluent Monitoring  • Include impaired pollutants if discharging that pollutant not being in the water).  • Follow up sampling within 30 days of a ractions resulting from the exceedance) above Records of Periodic Monitoring.  ecords of Corrective Actions  • Taken in response to 4 quarters of benching that pollutant profiles, or observed exceedances | ear. 24-hour rainfall event shall not shall no | out after a year of demonstration of the correct implementation of the correct design or operation resulting orized discharges, numeric li | tive<br>g in | X   | X   |
| Any untreated overflow from facilities designed, constitutions (40 CFR 411.32(b)).  Pecords of Comprehensive Annual Inspections   | ear. 24-hour rainfall event shall not shall no | out after a year of demonstration of the correct implementation of the correct design or operation resulting orized discharges, numeric li | tive<br>g in | X   | X   |
| Any untreated overflow from facilities designed, consmaterials storage piles which is associated with a 10-year TSS limitations (40 CFR 411.32(b)).  ecords of Comprehensive Annual Inspections  • Assess everything subject to permit (from Investigate and eliminate non-stormwate ecords of Employee Training training record was present for the last 12 more ecords of Benchmark Sampling  • Base compliance on 4 quarter average the above Records of Periodic Monitoring.  ecords of Effluent Monitoring  • Include impaired pollutants if discharging that pollutant not being in the water).  • Follow up sampling within 30 days of a ractions resulting from the exceedance) are above Records of Periodic Monitoring.  Taken in response to 4 quarters of benchmarks of pollutant profiles, or observed exceedances                                   | ear. 24-hour rainfall event shall not shall no | out after a year of demonstration of the correct implementation of the correct design or operation resulting orized discharges, numeric li | tive<br>g in | X   | X   |

|   | 5. SITE EVALUATION   |
|---|--|
| Pollutant Sources   | Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), potential pollutant, and pollutants off-site              |
| Loading/Unloading<br>Operations   | Not evaluated  |
| Outdoor Storage Facilities  | <ul> <li>Piles of broken dry concrete are stored outside (see photo DSCN1658).</li> </ul>  |
| Outdoor Manufacturing/<br>Processing Operations   | Not evaluated  |
| Liquid Storage Tanks  | Not evaluated  |
| Fueling Stations/Equipment<br>Maintenance Areas &<br>Cleaning Areas   | Not evaluated  |
| Management of Run-off Controls (storage areas, diversion ditches, dumpsters, secondary containment, & etc.) | <ul> <li>The washout pond was observed seeping washout (see photo DSCN1660).</li> <li>The facility tries to sweep once per month but does not keep a log.</li> </ul> |
| Sediment & Erosion<br>Controls  | Not evaluated  |

| 6. OUTFALL, ST   | ORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS  |
|--|--|
| Potential Stormwater<br>Discharge Points/Outfall(s)<br>to Receiving Water or MS4<br>(storm drains, channel,<br>swale, ditches, driveway,<br>pipes, & etc.) | See below.   |
| Evidence of Off-site<br>Accumulation of Pollutants<br>Observed in Receiving<br>Water & MS4   | At the time of inspection, Archer Western was unable to identify where Outfall #1 (see photo DSCN1665) discharges. Later records obtained from Archer Western and CSC did not identify where Outfall #1 discharges. In a Site Map (see photo DSCN1674) obtained from CSC, an additional outfall, Outfall #2, is identified in a detention pond (see photo DSCN1686) but also on the other side of a wall (see photo DSCN1685); note that both of these areas contained suspended solids. CSC stated that Outfall #2 is Metromont's outfall, however the EPA notes that the outfall is included in CSC's SWPPP. Another Outfall was identified by CSC representatives (see photo DSCN1683), however this is not included as an outfall in the Site Map, despite an arrow going to this location. An undesignated discharge along Simuel Rd was observed (see photos DSCN1672 and DSCN 1673) as evident due to the accumulation of sediment. |
| Non-stormwater Discharge<br>Off-Site Observed  | Water from piles and concrete washout were observed entering the stormwater collection system.   |

Exit interview conducted with: CSC's Plant Manager Wayne Amaker

An exit conference was held where the following observations were relayed to the company:

- The EPA requested the current NOI by December 19, 2018.
- Possible flow observed off the front of the site.
- Secondary containment was open on the Archer Western site.
- Turbid water was observed at the pond and outfall.
- No recent NOI on hand
- Older SWPPP not corrected to current conditions
- · Corrective actions must be documented.
- Archer Western does not sign any of CSC's forms.



# Concrete Supply Company (SCR005527) and Archer Western

Industrial Stormwater Inspection - SC

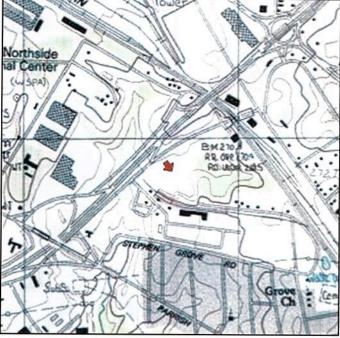
December 13, 2018 SW-CSCSimuel-12/13/18 U.S. Environmental Protection Agency - Region 4



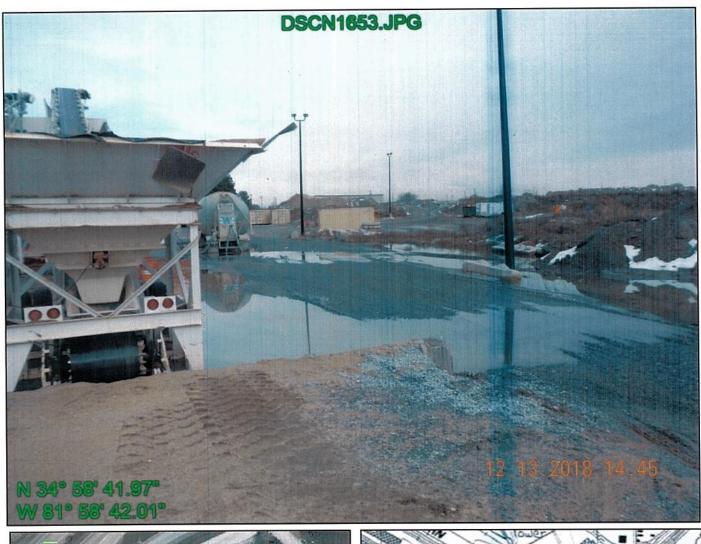








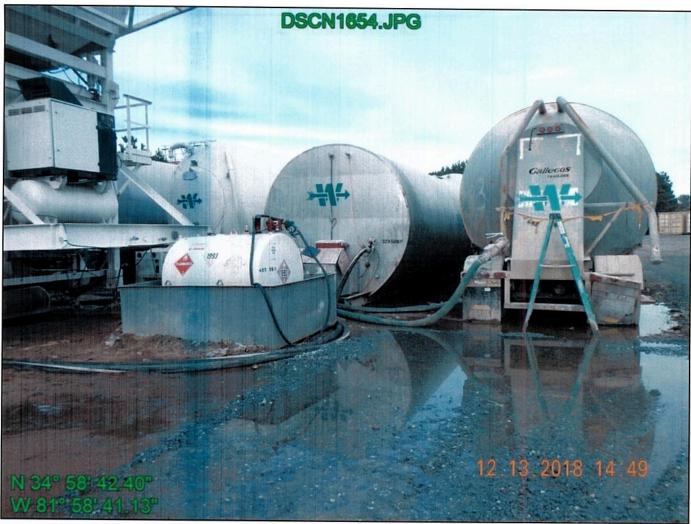
Description Aggregate and sand piles



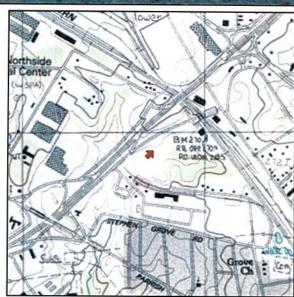




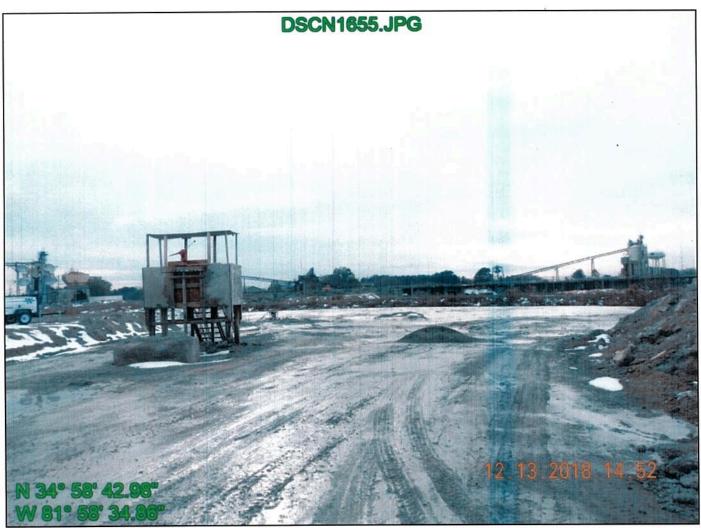
Description Road to washout pond in far ground of photo.



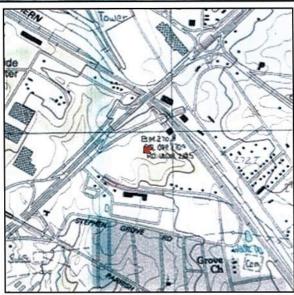




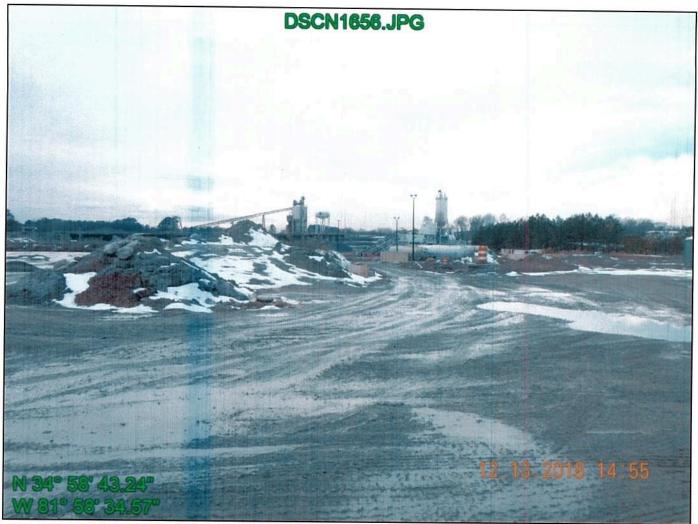
Diesel for loader and boiler. The drain plug for the secondary containment was off until inspectors pointed it out. The secondary containment was full of water with a sheen up to the drain level. There was no locking mechanism for the secondary containment drain.



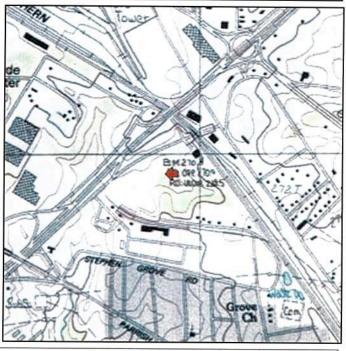




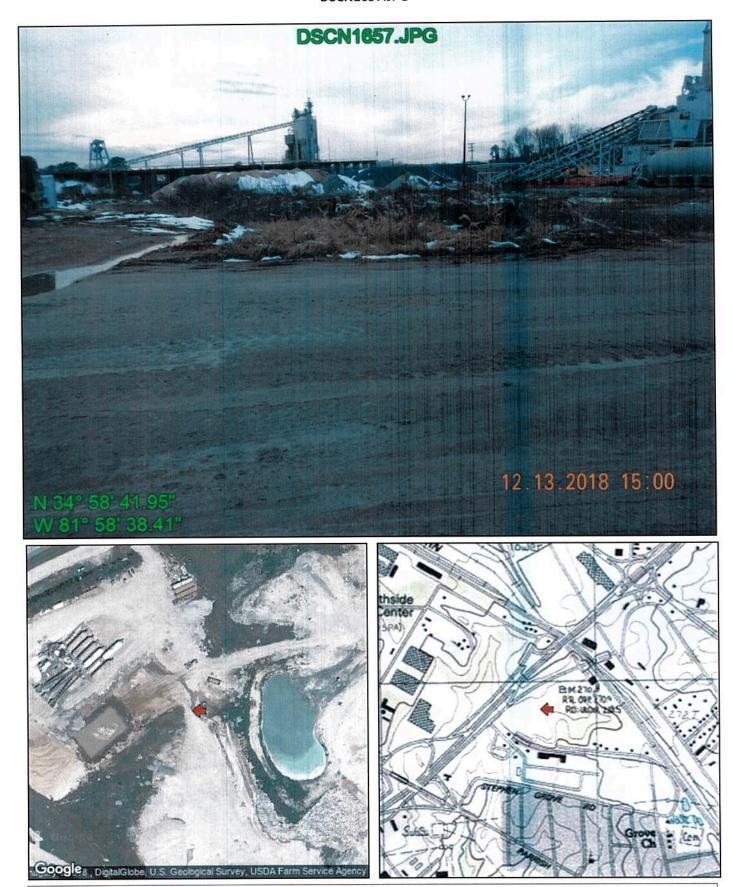
Shared concrete washout pond. The facility representative noted that it "needs excavation". A four-inch pump is attached to a nozzle to washout trucks. The excavation bill is shared. The facility representative was unsure of where the excavated material goes.





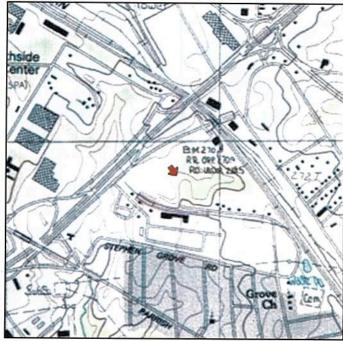


|             | Attributes  |
|-------------|---|
| Description | View of pond (left) looking downhill to the batch plant and the road. |



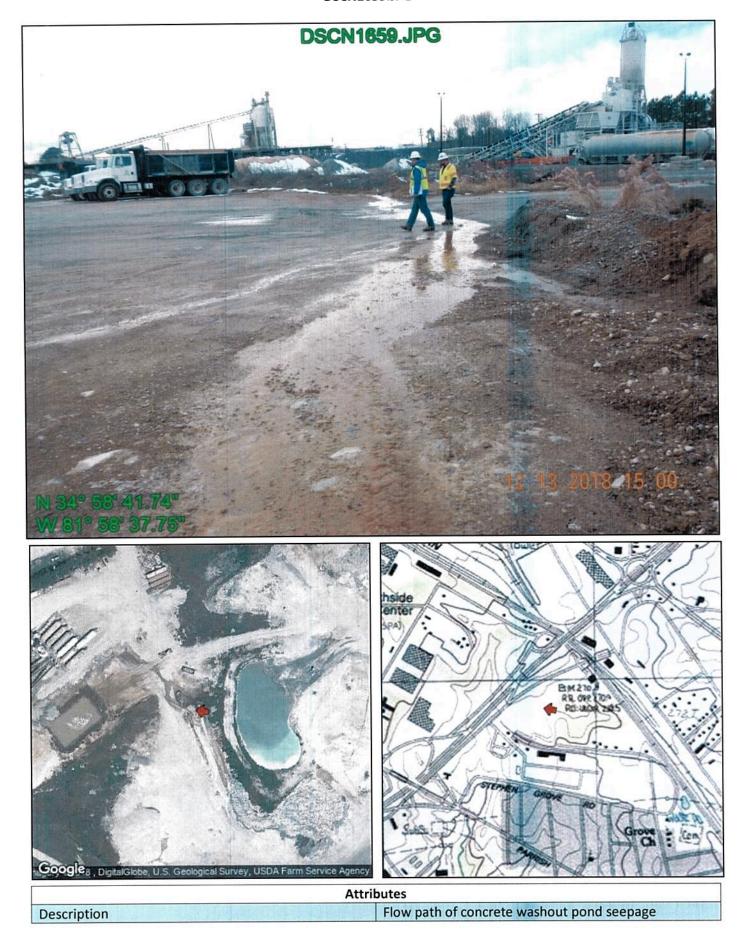






| Description |
|-------------|
|-------------|

View of trench behind pond and shared concrete pile. See photo DSCN1659 for where this water flows to.





Concrete Supply Company SCR005527

Description

**DSCN1658** 

Concrete washout pond seepage to trench in photo

#### DSCN1661.JPG

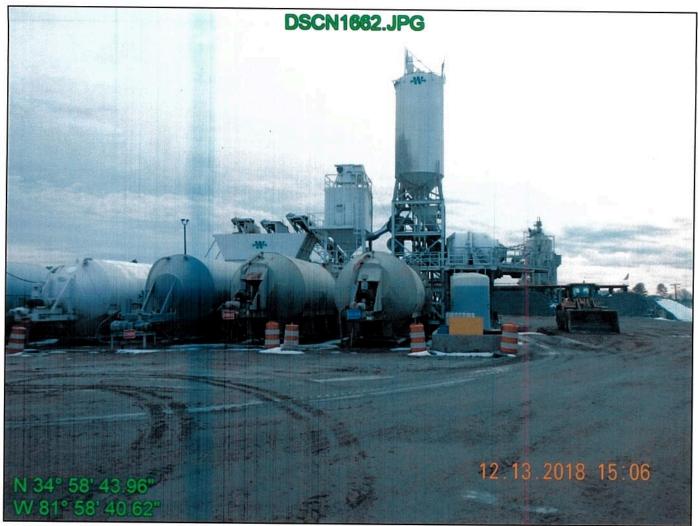






Description

Material staging with tote of certi-vex envoi cure white 1000 SC DOT

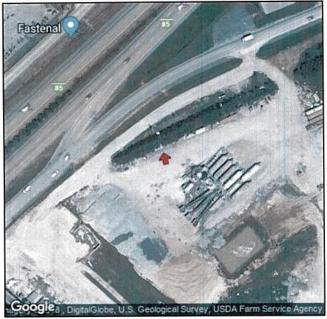






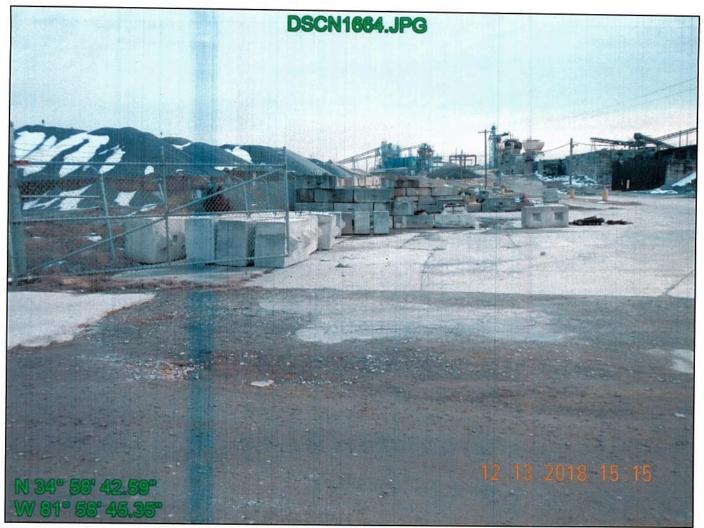
Tanks with secondary containment at the batch plant. The facility representative did not know how the secondary containment is emptied.

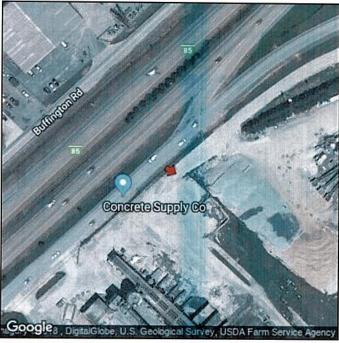


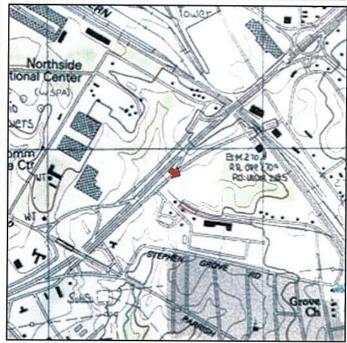




Tote of "white 1000 SC DOT" with black material in it. The small drum in the photo did not have a lid and contained black oil. The lidless bucket also contained black oil.



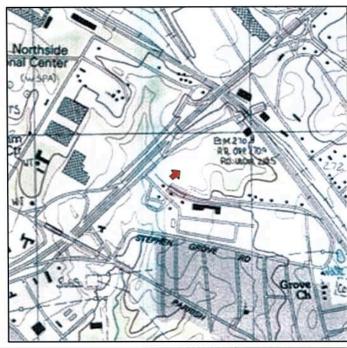




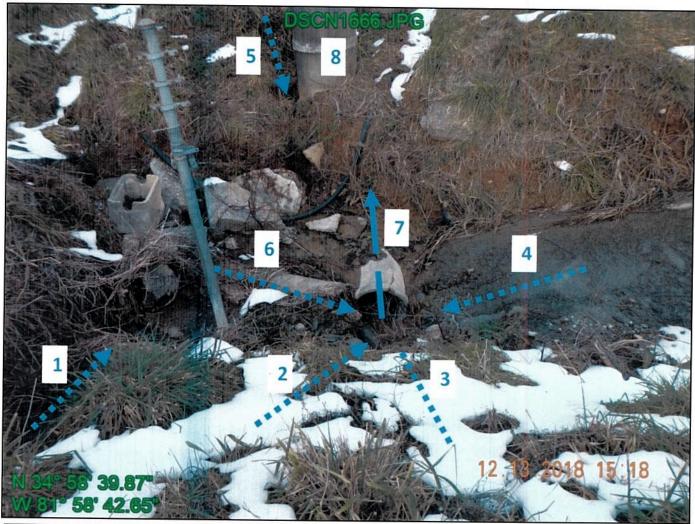
Flow comes from the left side of the photo (direction of batch plant) to this driveway. Backside of the facility's piles with material escaping concrete holding area.







View of labeled stormwater outfall. Also pictured in photos DSCN1666-1671.







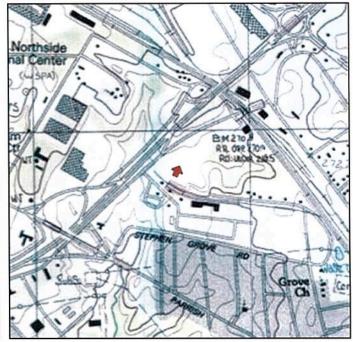
View of labeled stormwater outfall with numbered arrows noting direction of flow. Sources 1-2 and 4-6 flow to pipe 7. At the time of inspection, 1, 2, and 6 were actively flowing to 7.







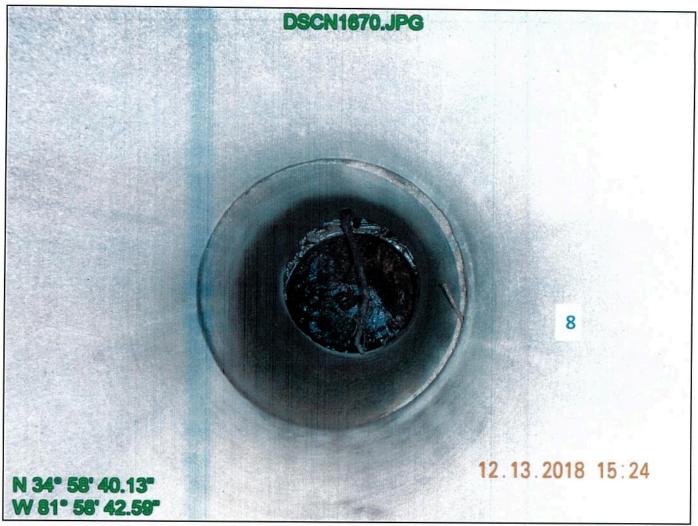




Description

Attributes

View of labeled stormwater outfall area with flow arrow.







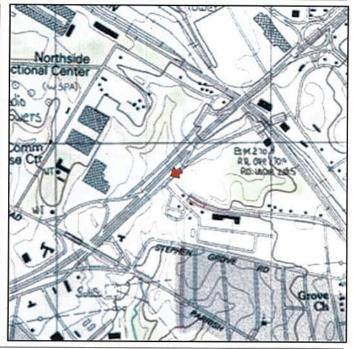
Description Flow inside of pipe 8. The top of the photo faces west.

View of labeled stormwater outfall area.



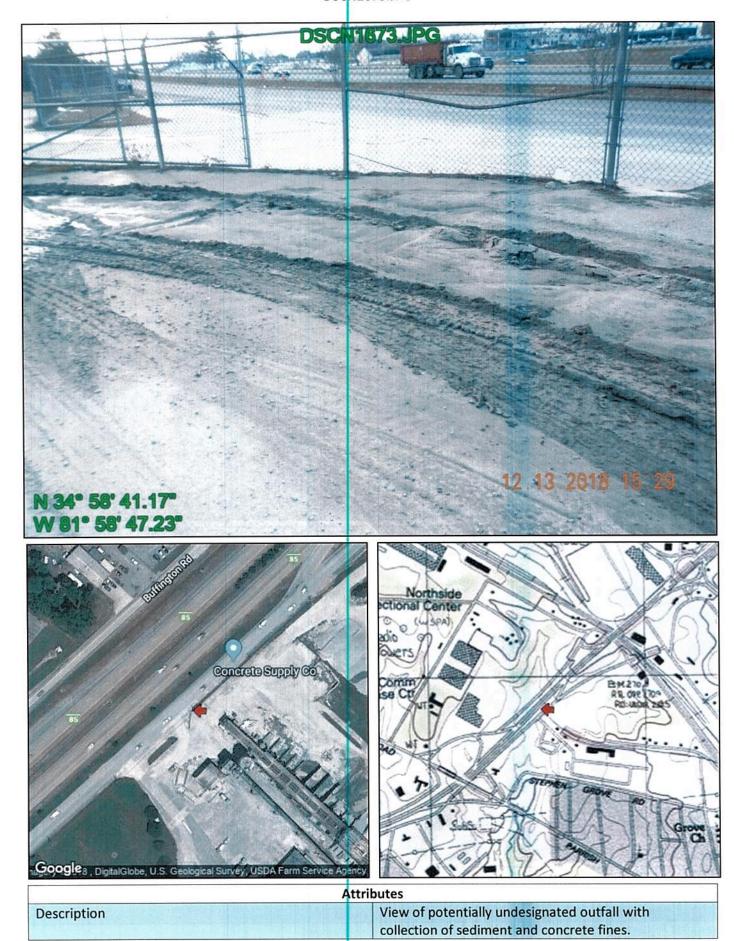






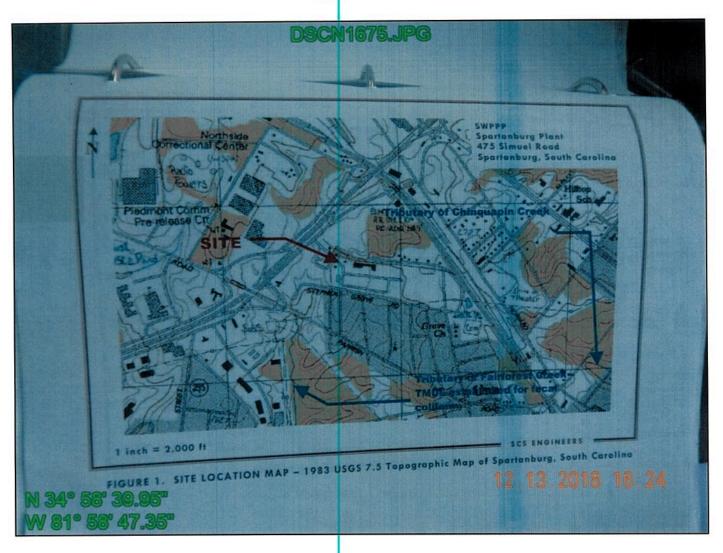
Description

View of drainage area to potentially undesignated outfall.



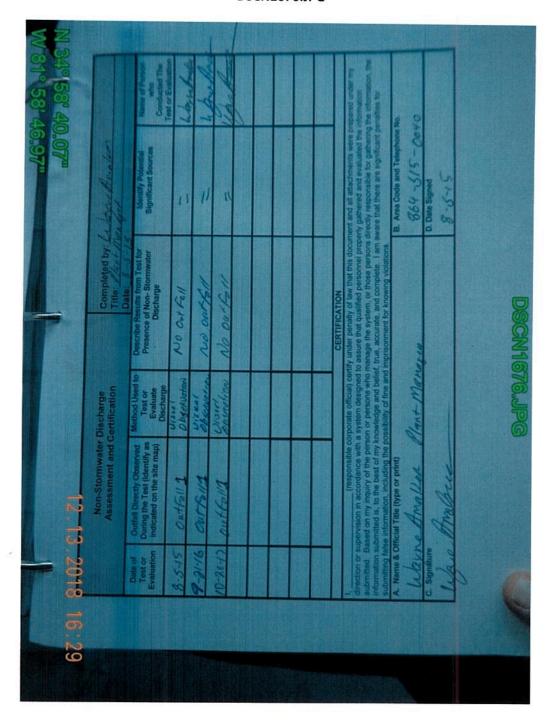


|             | Attributes   |
|-------------|--|
| Description | Figure 2 - Spartanburg Plant Site Map South from Concrete Supply Company's (CSC) Stormwater Pollution Prevention Plan (SWPPP) binder It illustrates Outfalls #1 and #2. In pen, CSCO was added and appears to illustrate a 3 <sup>rd</sup> outfall. Note that Archer Western's batch plant and piles are not located on this Site Map. The common washout pond (DSCN1655) is not on the Site Map as required by Permit Part 8.E.3.1. |

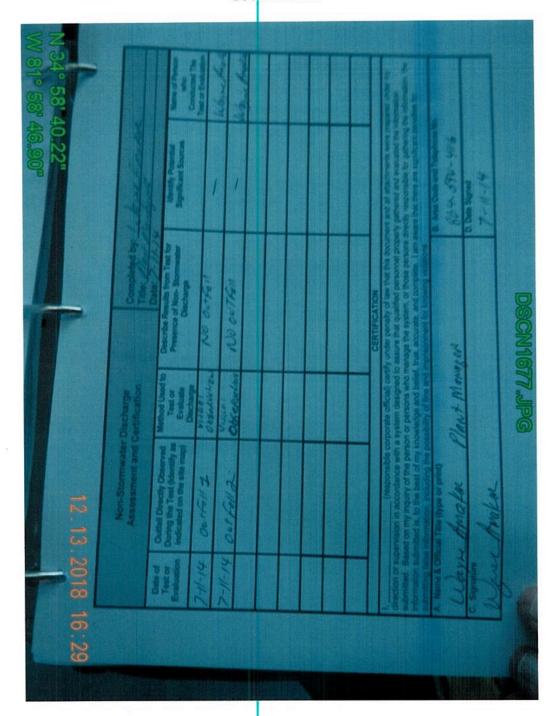


| Attributes  |  |  |  |  |
|-------------|--|--|--|--|
| Description | Figure 1. Site Location Map from CSC's SWPPP binder. It includes a tributary to Fairforest Creek (included in the 2011 NOI) with a TMDL for fecal coliform and a tributary to Chinquapin Creek (which was not included in the 2011 NOI). |  |  |  |

## Attributes DSCN1676.JPG

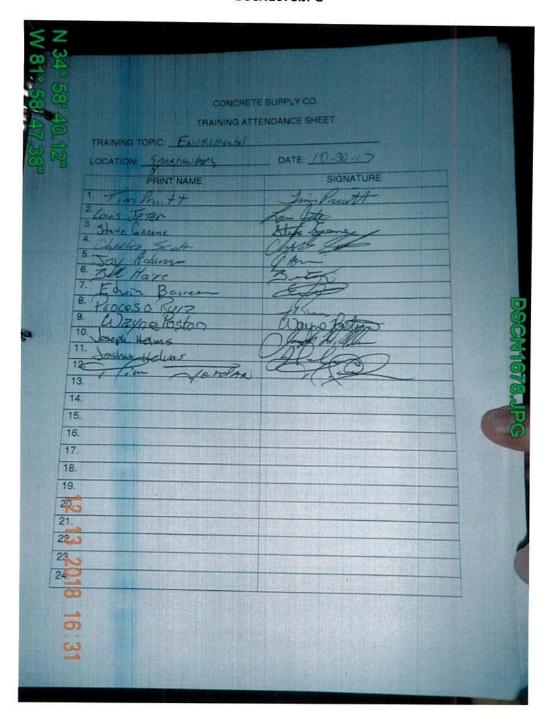


|             | Attributes   |
|-------------|--|
| Description | August 2015 Non-Stormwater Discharge Assessment Certification from CSC's SWPPP binder. It documents August 5, 2015 Outfall 1 visual observation, September 21, 2016 Outfall 1 visual observation and October 20, 2017 Outfall 1 visual observation. For all three dates, the "Presence of Non-Stormwater Discharge" is listed as "No Outfall" and no potential sources are identified. The certification statement was not signed for the 2016 or 2017 observations. |



| Attributes  |  |  |  |  |
|-------------|--|--|--|--|
| Description | July 11, 2014 Non-Stormwater Discharge Assessment Certification for Outfalls 1 and 2 with signed certification statement from CSC's SWPPP binder. For both Outfalls, the "Presence of Non-Stormwater Discharge" is listed as "No Outfall" and no potential sources are identified. |  |  |  |

#### DSCN1678.JPG



| Attributes  |   |  |  |  |
|-------------|---|--|--|--|
| Description | October 30, 2017 Training Attendance Sheet from CSC's SWPPP binder. Note that none of the names from the Archer Western contacts were present. Permit 2.1.2.9 requires employee training at least annually. |  |  |  |

| 100   | Real Property of the Party of t |   | -  | THE PARTY OF THE P |  | Made and                     | BENGE OF   |  |
|-------|--|---|--|--|--|------------------------------|--|--|
| 3     |  |   | 1  | ndustrial A<br>NPDES   | ctivities (Ex  | ter Dischar<br>copt Cons     | 00000  |  |
|       | This form in for use by those facilities of below constitutes more that the production of the producti | s seeking a<br>arry identification of<br>activity en<br>and condition<br>FORM | ecurtificate<br>and in Sect<br>a State loc<br>ans of the p | on under the Fig.<br>act A of this form<br>alion identified i<br>perrol, ALL NEC   | interest NPDES &<br>inhances to be aw<br>in Section III of the<br>ESSARY BUFOR   | MATION MUST                  | or Perris. Sistems of DES perrist source of the Propyrise | of the Holiza<br>Character makes<br>palent back of<br>1 THE FORM   |
|       | Date:  A. Facility Operator Informa  1. Name: CEMEX Con  2. Company RIN 26.  3. Mailing Address: 9.3  City: Charlotte  4. Facility Contact  5. Facility Contact Email a  |   |  |  |  |                              |  |  |
|       | 3. Mailing Address 913<br>City Charlotte<br>4. Facility Contact<br>5. Facility Contact Email a<br>6. Facility Billing Address<br>City:   | Waynu<br>address<br>(If differe   | Ame  | muchaek<br>dailing addres  | State HC Phone B W. dmutter  5)  | Zp 21<br>64 S 2 s<br>Q Cenex | 0259<br>4-4116 Ed<br>Om  |  |
|       | Facility Information     Facility Information     Facility Name:     Are stormwater discharger if yes, provide your country.   | E ME  | c- Si  | antanbor   | State:   | rial Stormwat                | ler General Perm   | 17 E Yes O No  |
|       | 3. Facility Location a. Street 415 b. City: c. County: d. Latitude: 34 5 6 e. Lat/Long Data Sourc f. Estimated area of in.   | Simus<br>Span   | l Re   | , , ,  | _ Zip Code_<br>.ongitude: - !  | 29304<br>8 L 5 B             | 33. M  |  |
| •     | e. Lat/Long Data Source f. Estimated area of ining. Is this a Federal facility located h. Is this facility located   | lity?   | ☐ Yes !  | ITNo .   | <b>经济州风景大学</b>   |                              | 92 (acre   |  |
|       | Discharge Information     Does your facility dischar     If yes, name of MS4 open  | erator  | -00  | o travours   | Churt  |                              | CONTRACTOR DESCRIPTION OF THE PARTY OF THE P | TO THE RESIDENCE OF THE PARTY O |
|       | Does your facility have another NPDES permit     Receiving Waters (if add  | stormwa<br>7 🗆 Yes  | ter disch  | orges that an  | e mixed with n<br>de permit num<br>sestion. Mi out 2   | iber(s):                     | ster discharges c  | overed under   |
|       | a. What are the names of your receive  | ing waters  | 10000  | ance to receiving  | THE RESERVE OF THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TW |                              | cation of receiving w  | -  |
|       | through an MS47 Three Mile Creek   |   | 1  | 438 F  | <b>†</b>   | F                            | w  |  |
| 12    | Impaired waters found of   | in the me   | ast curre  | ot 303(d) Lis  | of Impaired \  | Naters (use                  | the table below to   | only those waters  |
| 2     | Impaired waters found of found on the most current :     Name of Impaired Water (303(d) Listed)  | 303(d) Lis<br>b. N<br>Qua<br>(WOt   | arne of Impa-<br>lity Monito<br>(\$5) that re              | paired Waters — L<br>paired Water<br>rang Stations<br>paires storm-  | c. What pollutar   | nts are causing              | d Are the political she impairment   | utants causing present in your present in your   |
| 2     |  |   | from your through a $B-02$                                 | MS47   |  |                              | ☐ Yes  | Ø/No<br>Ø/No   |
| -     | Fairfaust Cook Fairfaust Cook Fourfaust Cook OSC 56 Fourfaust Cook OSC 56  |   | 8-16   | 4  | FO   |                              | D Yes  | NO NO  |
| man I |  | THE RESERVE AND ADDRESS OF THE PERSON NAMED IN                                | B-02   | WHITE STREET,  | DI   | Married World World          | ☐ Yes  |  |

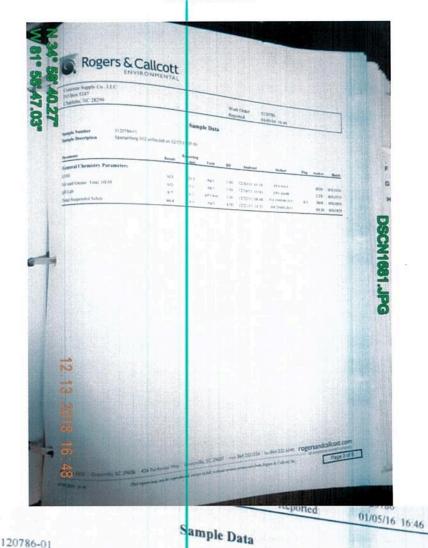
| Attributes  |   |  |  |  |
|-------------|---|--|--|--|
| Description | March 22, 2011 Notice of Intent (NOI) for operator CEMEX Construction Materials Atlantic, LLC's "CEMEX – Spartanburg" facility from CSC's SWPPP binder. The previous permit number was SCR000553. The facility is 92 acres in Spartanburg County's MS4. The receiving water is Three Mile Creek. Four Impaired Water Quality Monitoring Stations are listed for Fairforest Creek with pollutants of fecal coliform and B10. |  |  |  |

## DSCN1680.JPG

| 8                 | Covered by a EPA approximation of the Covered by a EPA approximation of the Covered Co | Alles<br>red or  | Optoved or established TMDL L of additional space is needed  It. Name of Impared Water Gually Manisotrop Salasons (WGMS) that missies storm- water som your facility across through an MS49  B-CEO   | c. What pollutarits are listed in the TMDLs for this waterbody?  | If Ann the published resourcy<br>the englarement project in your<br>discharge?  |
|-------------------|--|--|--|--|---|
| 5                 | Fair Cost Cost Q 5-  | 22-651   | 8-16-9   | FC   | O Yes Brito   |
| N                 |  |  | B-021  | FC   | O Yes P No  |
|                   | b. If yes, identify in the   | table be   | nd Sector-Specific Requireme<br>iffluent limitation guidelines for<br>low which effluent limitation g  | nts<br>und in SCR000000? Cl Yeuldelines apply to your stor   |   |
|                   | 40 CFR Part/Subpart  |  | Eligible Discharges  | Affected ICP Sector 1  | Check if Applicable   |
|                   | Part 411, Suppart C  | Runett   | from material storage piles at cemer<br>manufacturing facilities   |  | O O   |
|                   |  | man  | Runoff from phosphate fertilizer<br>ufacturing facilities that comes into  |  |   |
|                   | Part 418 Subpart A   | product  | act with any raw materials, finished<br>by-products or waste products (SIC<br>2874)<br>le runoff at steam electric generating  | C  |   |
|                   | Part 423   | OF REAL PROPERTY.  | facilities   | 0  | 0   |
|                   | Part 429, Subpart I  | Disch  | arges resulting from spray down or   |  | CONTRACTOR OF THE PARTY OF THE |
| 1 1               |  | intentio   | anal wetting of logs at wet deck stor-<br>age areas  | ^  |   |
| 1                 | Part 443, Subpart A  | Runo   | age areas  off from asphalt emulsion facilities  | A D  | 0   |
| Hin.              | Part 443, Subpart A Part 445, Subparts A & B  If you are a Sector S (Air deicing/ anti-icing chemic Identify the applicable S activity, for which you are  | Runoff Runoff I Transpo  | age areas off from asphalt emulsion facilities from hazardous waste and non-haz- ardous waste landfills ritation) facility, do you anticip or 100 tons or more of urea o (s), Sector(s) and Subsector operators operators  | D K. L Date using more than 100, in an average annual basi (s) of industrial activity, in  | D00 gallons of glycol-based s? ☐ Yes ☐ No 圖 N/A   |
| Hin.              | Part 443, Subpart A Part 445, Subparts A & B  If you are a Sector S (Air deicing/ anti-icing chemic lidentify the applicable S activity, for which you are a. SIC Code: 3272 Sec. SIC Code: 7238 Sec. SIC Code: 7338 Sec. SIC Code | Runoff Runoff r Transpo cals and/citC Codes e request ctorctorctor   | age areas  Iff from asphalt emulsion facilities from hazardous waste and non-hazardous waste landfills  Intation) facility, do you anticip or 100 tons or more of urea o (s), Sector(s) and Subsector ing permit coverage. List you Subsector Subsector Gubsector Gubbector Gubbecto | oate using more than 100, in an average annual basis (s) of industrial activity, in a facility's primary SIC Code. SIC Code 32±1 Sector SIC Code 505 | 000 gallons of glycol-based s?  |
| 8. D. 1. 2. 3. 4. | Part 443, Subpart A Part 445, Subparts A & B  If you are a Sector S (Air deicing/ anti-icing chemic lidentify the applicable S activity, for which you are a. SIC Code: 3212 Sec. SIC Code: 3212 Sec. SIC Code: 7528 Sec. SIC Code | Runoff or Transport of the International Code of the International Cod | appeares  age areas  areas  areas  con hazardous waste and non-hazardous  areas  areas  con non-hazardous  age areas  age areas  con age areas  | b K L  ate using more than 100, in an average annual basis (s) of industrial activity, in facility's primary SIC Coo. SIC Code: 321 Sector SIC Code: SIC Code: Sector SIC Code:  | DOO gallons of glycol-based s? □ Yes □ No □ TV/A cluding co-located industrial de in Line a:  or _ Subsector _ or _ or _ Subsector _ or _ Subsector _ or _   |
| 8. D. 1. 2. 3. 4. | Part 443, Subpart A Part 445, Subpart A Part 445, Subparts A & B  If you are a Sector S (Air deicing/ anti-icing chemic lidentify the applicable S activity, for which you are a. SIC Code: 3212 Sec. SIC Code: 3212 Sec. SIC Code: 7528 Sec. SIC Code | Runoff or Transport of the International Code of the International Cod | age areas  age age areas  age are | b K L  ate using more than 100, in an average annual basis (s) of industrial activity, in facility's primary SIC Coo. SIC Code: 321 Sector SIC Code: SIC Code: Sector SIC Code:  | D000 gallons of glycol-based s? Pres No PN/A cluding co-located industrial de in Line a: or Subsector or  |

| Attributes  |  |  |  |  |
|-------------|--|--|--|--|
| Description | March 22, 2011 Notice of Intent (NOI) for CEMEX from CSC's SWPPP binder. It lists SIC Codes 3273, 3272, 7538, 3271, and 5039 |  |  |  |

#### DSCN1681.JPG



Sample Number Sample Description

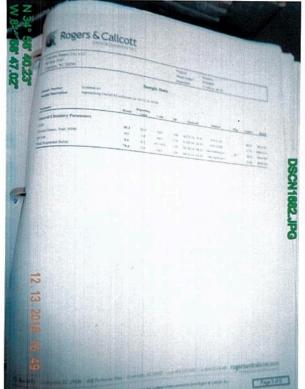
5120786-01

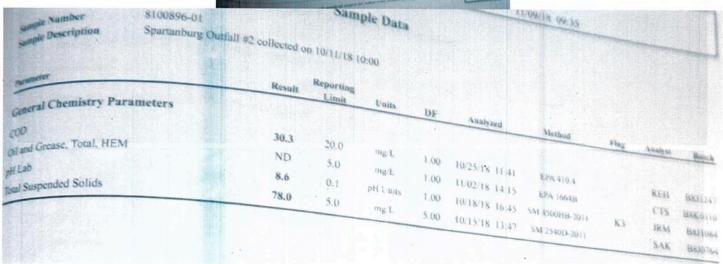
Spartanburg 002 collected on 12/17/15 07 00

| General Chemistry Parameters      | Result   | Reporting<br>Limit | Units            | DF   | Analyzed                         |           |      |            |                    |
|-----------------------------------|----------|--------------------|------------------|------|----------------------------------|-----------|------|------------|--------------------|
| COD<br>Oil and Grease, Total, HEM | ND<br>ND | 20 0               | mg/L             | 1.00 | 12/30/15 10:18                   | Method    | Flag | Analyst    | Batch              |
| pH Lab                            | 9.7      | 01                 | mg/L<br>pH Units | 1.00 | 12/18/15 10:00 .                 | EPA 1664B |      | REH<br>CTS | B5L1036<br>B5L0753 |
| Total Suspended Solids            | 60.4     | 40                 | mg L             |      | 12/22/15 08 48<br>12/21/15 14 25 |           | K3   | JRM<br>MLM | B5L0874<br>B5L0829 |

| Attributes    |   |  |  |  |
|---------------|---|--|--|--|
| Description . | December 17, 2015 sample from 002 in CSC's SWPPP binder. Total Suspended Solids (TSS) were 60.4 and pH was 9.7. These values exceeded the TSS and pH effluent limit in part 8.E.5 of the Permit. No corrective action was observed in the SWPPP binder. |  |  |  |

## DSCN1682.JPG

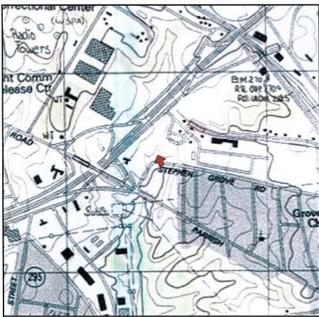




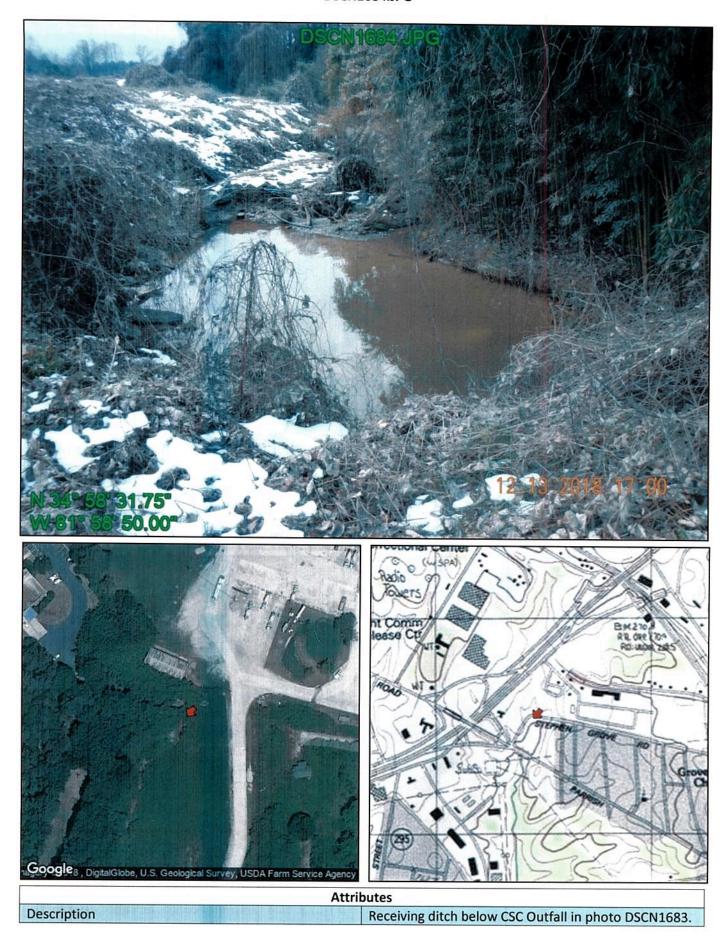
| Attributes  |  |
|-------------|--|
| Description | October 11, 2018 Outfall #2 sample in CSC's SWPPP binder. Total Suspended Solids were 78.0 mg/L, pH was 8.6, and COD was 30.3 mg/L. TSS of 78.0 mg/L. The TSS effluent limit in part 8.E.5 of the Permit is 50 mg/L for discharges from material storage piles at cement manufacturing facilities and 100 mg/L in part 8.E-1. No corrective action was observed in the SWPPF binder. |





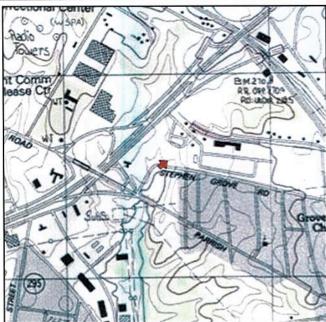


The Backup Plant Manager, Wayne Poston, described this as the Outfall for CSC. It is flowing. This matches the location designated as "CSCO" in the map shown in photo DSCN1674.





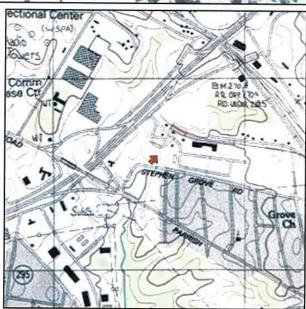




Two pipes with red circles added for easier viewing. One of these pipes appears to be the outfall from Metromont's pond (see photo DSCN1686). Note the turbid color.







CSC's Wayne Amaker stated that this is Metromont's pond and outfall (corner of pond in bottom right). This pond is located on CSC's Site Plan. Note the turbid color.